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August 1, 2022

VIA ECF
Hon. Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: In re Chase Romick, et al., Case No. 22-mc-00194-RA (S.D.N.Y.)

Dear Judge Abrams:

We write jointly on behalf of Dana-Farber Cancer Institute, Inc. (“Dana-Farber”) and Movants Chase Romick and Pfizer, Inc. to respectfully request a modification to the briefing schedule regarding Movants’ pending motion to quash (ECF No. 1).

Dana-Farber respectfully requests an unopposed three-day extension of its deadline to file its answering memorandum of law in response to Movants’ motion to quash (ECF No. 1). The current deadline for DFCI’s answering memorandum of law is August 1, 2022. DFCI’s requested extension would extend the deadline to August 4, 2022. Movants have consented to Dana-Farber’s requested extension on the condition that the deadline for Movants’ reply is extended to August 10, 2022. Dana-Farber does not oppose Movants’ requested extension.

Granting the parties’ requested modification would also align briefing schedules regarding similar issues in two pending cases in this District. There is a co-pending motion to quash before Judge Schofield regarding another related Pfizer witness, which raises nearly identical issues. *See Myers, et al. v. Dana-Farber Cancer Institute, Inc.*, Case No. 22-mc-00198-LGS, ECF No. 1 (S.D.N.Y.). The parties are simultaneously filing a letter-motion with Judge Schofield to request the same briefing schedule.

Accordingly, Dana-Farber and Movants respectfully request that the Court grant the parties’ joint request to extend Dana-Farber’s deadline to file its answering memorandum of law to August 4, 2022, and to extend Movants’ deadline to file their reply to August 10, 2022.

Respectfully Submitted,

/s/ Katherine A. Helm

Katherine A. Helm

Counsel for Dana-Farber Cancer Institute Inc.

/s/ Lara Samet Buchwald

Lara Samet Buchwald

Counsel for Pfizer Inc. and Chase Romick

Application GRANTED.

Dated: August 3, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE